

**REMARKS**

Claims 1-28 remain pending in the application.

The Applicants respectfully request the Examiner to reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

**Claims 1-3, 8, 9, 14, 22-24, 27 and 28 over Park in view of AAPA**

In the Office Action, claims 1-3, 8, 9, 14, 22-24, 27 and 28 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Park, U.S. Patent No. 5,502,217 (“Park”) in view of Applicants’ Admitted Prior Art (“AAPA”). The Applicants respectfully traverse the rejection.

Claims 1-3, 8, 9, 14, 22-24, 27 and 28 recite an apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a first wireless device and as a hybrid echo canceler in a second wireless device.

The Examiner acknowledges that Park fails to disclose or suggest that an echo canceler that operates through a common connection as an acoustic echo canceler and as a hybrid echo canceler (Office Action, page 3).

The Examiner alleges that AAPA discloses an acoustic echo canceler included in a cordless handset and a hybrid echo canceler in a base unit through a common telephone signal connection (Office Action, page 4). However, the Examiner acknowledges that AAPA fails to disclose or suggest an echo canceler that operates through a common physical connection as an acoustic echo canceler and as a hybrid echo canceler (Office Action, page 4).

Therefore, claims 1-3, 8, 9, 14, 22-24, 27 and 28 are amended herein to recite an apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a first wireless device and as a hybrid echo canceler in a second wireless device, that the Examiner acknowledges is not disclosed or suggested by the cited prior art.

Accordingly, for at least all the above reasons, claims 1-3, 8, 9, 14, 22-24, 27 and 28 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 6, 7 and 15-26 over Park in view of AAPA and Iyengar**

In the Office Action, claims 6, 7 and 15-26 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Park in view of AAPA, and further in view of Iyengar, U.S. Patent No. 5,663,955 ("Iyengar"). The Applicants respectfully traverse the rejection.

Claims 6, 7, 23 and 24 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 6, 7 and 15-26 recite, *inter alia*, a method and apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a first wireless device and as a hybrid echo canceler in a second wireless device.

As discussed above, neither Park nor AAPA, either alone or in combination, disclose, teach or suggest a method and apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a first wireless device and as a hybrid echo canceler in a second wireless device, as recited by claims 6, 7 and 15-26.

The Office Action relies on Iyengar to allegedly make up for the deficiencies in Park in view of AAPA to arrive at the recited invention. The Applicants respectfully disagree.

Iyengar appears to disclose an echo canceler system that includes first and second echo cancelers (Abstract). In a loudspeaker telephone set with full-duplex operation, an acoustic path arises between a loudspeaker and a microphone, and a line echo path arises at a hybrid transformer which connects a set's four-wire system to a two-wire local customer loop (Iyengar, col. 3, lines 30-34). A first echo canceler is used for canceling a line echo, and a second echo canceler is used for canceling acoustic echo (Iyengar, col. 3, lines 34-36).

Iyengar discloses application of an echo canceler system that includes first and second echo cancelers for a loudspeaker telephone set. A loudspeaker telephone set, i.e., a single device, that uses two echo cancellers, i.e., first and second echo cancellers utilized in a single device is **NOT** a method and apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a first wireless device and as a hybrid echo canceler in a second wireless device, as recited by claims 6, 7 and 15-26.

Neither Park, AAPA nor Iyengar, either alone or in combination, disclose, teach or suggest a method and apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a first wireless device and as a hybrid echo canceler in a second wireless device, as recited by claims 6, 7 and 15-26.

Accordingly, for at least all the above reasons, claims 6, 7 and 15-26 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 12, 13 and 21 over Park in view of AAPA, Iyengar, Velardo and Danstrom**

In the Office Action, claims 12 and 13 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Park in view of AAPA, and further in view of Velardo et al., U.S. Patent No. 5,587,998 ("Velardo"), and still further in view of Danstrom, U.S. Patent No. 4,582,963 ("Danstrom"), with claim 21 rejected under 35 U.S.C. §103(a) as allegedly being obvious over Park in view of AAPA, Iyengar, Velardo and Danstrom. The Applicants respectfully traverse the rejection.

Claims 12, 13 and 21 are dependent on claims 1 and 15 respectively, and are allowable for at least the same reasons as claims 1 and 15.

Claims 12, 13 and 21 recite, *inter alia*, a method and apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a first wireless device and as a hybrid echo canceler in a second wireless device.

As discussed above, Park in view of AAPA and Iyengar fails to disclose or suggest a method and apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a first wireless device and as a hybrid echo canceler in a second wireless device, as recited by claims 12, 13 and 21.

The Office Action relies on Velardo and Danstrom to allegedly make up for the deficiencies in Park, AAPA and Iyengar to arrive at the recited invention. The Applicants respectfully disagree.

Velardo appears to disclose a method and apparatus for reducing, in a communication signals received by a local network from a remote network, energy content attributable to echoes of signals transmitted into a local network (Velardo, Abstract). Selective regulation of individual frequency sub-bands leads to higher operational stability and better voice quality than are achieved using conventional, fullband nonlinear processors for reducing echo (Velardo, col. 5, lines 18-22).

Danstrom appears to disclose a telephone echo canceling circuit employing a digital transversal filter which adapts to incorporate an impulse response (Abstract). The initial zero response created by transmission delays are ignored through the use of a memory that holds signal samples for this period (Danstrom, col. 2, lines 16-47).

Velardo discloses selective regulation of individual frequency sub-bands. Selective frequency regulation is **NOT** a method and apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a first wireless device and as a hybrid echo canceler in a second wireless device, as recited by claims 12, 13 and 21.

Danstrom discloses an echo canceling circuit that is able to ignore an initial zero response. Danstrom fails to disclose an echo canceler that connects to two devices, much less a method and apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a first wireless device and as a

hybrid echo canceler in a **second wireless device**, as recited by claims 12, 13 and 21.

Neither Park, AAPA, Iyengar, Velardo nor Danstrom, either alone or in combination, disclose, teach or suggest a method and apparatus utilizing an echo canceler module that is configurable to operate through a **common physical connection** as an acoustic echo canceler in a **first wireless device** and as a hybrid echo canceler in a **second wireless device**, as recited by claims 12, 13 and 21.

Accordingly, for at least all the above reasons, claims 12, 13 and 21 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 4, 5, 10, 11, 17 and 20 over Park in view of AAPA, Iyengar, Velardo and Sih**

In the Office Action, claims 4 and 5 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Park in view of AAPA, and further in view of Sih, U.S. Patent No. 5,687,229 (“Sih”). Claims 10 and 11 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Park in view of AAPA, and further in view of Velardo and Sih. Claim 17 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Park in view of AAPA, and further in view of Iyengar and Sih. Claim 20 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Park in view of AAPA, and further in view of Iyengar and Sih.

Claims 4, 5, 10, 11, 17 and 20 are dependent on claims 1 and 15 respectively, and are allowable for at least the same reasons as claims 1 and 15.

Claims 4, 5, 10, 11, 17 and 20 recite, *inter alia*, a method and apparatus utilizing an echo canceler module that is configurable to operate through a **common physical connection** as an acoustic echo canceler in a **first wireless device** and as a hybrid echo canceler in a **second wireless device**.

As discussed above, neither Park, AAPA, Iyengar and Velardo, either alone or in combination, disclose, teach or suggest a method and apparatus utilizing an echo canceler module that is configurable to operate

through a common physical connection as an acoustic echo canceler in a **first wireless device** and as a hybrid echo canceler in a **second wireless device**, as recited by claims 4, 5, 10, 11, 17 and 20.

The Office Action relies on Sih to allegedly make up for the deficiencies in Park, AAPA, Iyengar and Velardo to arrive at the recited invention. The Applicants respectfully disagree.

Sih appears to disclose a method of controlling echo canceling in an echo cancelation system using a state machine controller (Abstract). The echo canceler includes a state machine which is configured into a predetermined state of a plurality of states depending on presence of a near-end speech signal, a far-end speech signal, or both a near-end and a far-end speech signals (Sih, Abstract). Based on a predetermined state of the state machine, the controller in the state machine controls the update of coefficients of a plurality of adaptive filters (Sih, Abstract). To preserve echo filter coefficients of an echo canceler filter, a variable adaptation threshold is used to switch on and off adaptation of the echo canceler filter (Sih, col. 13, lines 29-32).

Sih discloses an echo canceler using a plurality of adaptive filters. An echo canceler using adaptive filters is **NOT** a method and apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a **first wireless device** and as a hybrid echo canceler in a **second wireless device**, as recited by claims 4, 5, 10, 11, 17 and 20.

Neither Park, AAPA, Iyengar, Velardo nor Sih, either alone or in combination, disclose, teach or suggest a method and apparatus utilizing an echo canceler module that is configurable to operate through a common physical connection as an acoustic echo canceler in a **first wireless device** and as a hybrid echo canceler in a **second wireless device**, as recited by claims 4, 5, 10, 11, 17 and 20.

Accordingly, for at least all the above reasons, claims 4, 5, 10, 11, 17 and 20 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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